

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**RODERICK FREEMAN, #104446**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 3:15-cv-589-DPJ-FKB**

**MANAGEMENT & TRAINING CORPORATION,  
OFFICER MCCONNELL, AND OFFICER HUNT**

**DEFENDANTS**

**NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM**

TO: All Counsel of Record

You will please take notice that Management & Training Corporation, and Officer Hunt, Defendants in the above-referenced case, by and through counsel, will issue the Subpoena Duces Tecums to:

1. MISSISSIPPI DEPARTMENT OF CORRECTIONS  
Attention: Carolyn in Medical Records  
633 N. State Street  
Jackson, Mississippi 39202  
(attached as Exhibit "A")
2. MISSISSIPPI DEPARTMENT OF CORRECTIONS  
Attention: ERS Department  
421 W. Pascagoula Street  
Jackson, Mississippi 39202  
(attached as Exhibit "B")

Copies of the Subpoenas have been provided to counsel.

THIS, the 8<sup>th</sup> day of August, 2016.

MANAGEMENT & TRAINING CORPORATION  
AND LAKEISHA HUNT

BY: /s/ Steven J. Griffin  
OF COUNSEL

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DANIEL COKER HORTON AND BELL, P.A.  
4400 OLD CANTON ROAD, SUITE 400  
POST OFFICE BOX 1084  
JACKSON, MISSISSIPPI 39215-1084  
TELEPHONE: (601) 969-7607  
FACSIMILE: (601) 969-1116

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2016, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which provided notice to counsel below:

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*Attorney for Defendant Mary McConnell*

THIS, the 8<sup>th</sup> day of August, 2016.

/s/ Steven J. Griffin  
STEVEN J. GRIFFIN